

# **ATTACHMENT 23**



295 North Maple Ave.  
Basking Ridge, NJ 07920

June 22, 1998

Mr. W. Scott Schaefer  
President - Interconnection Services  
BellSouth Telecommunications, Inc.  
Suite 4811  
675 West Peachtree Street, N. E.  
Atlanta, Georgia 30376

Dear Scott:

I received your June 15, 1998, letter regarding EDI 6 and EDI 7. I, too, hope we can establish a business relationship that will allow us to pursue mutually beneficial opportunities. Recent experience with BellSouth's disregard of our two companies' interconnection agreement and the reneging on representations made by BellSouth employees in negotiations with AT&T indicates to me that that hope may be premature, however. The AT&T - BST interconnection agreement called for a full electronic ordering capability to be put in by December 31, 1997. Although EDI 6 required manual handling of AT&T Digital Link subsequent partial migration orders, it did perform that task. When BellSouth moved to EDI 7, it eliminated this capability without prior notice to AT&T. We first found out about this during testing in May when a partial and subsequent migration order was rejected. The contract contemplates mutually agreeable testing of new interfaces and conditions the acceptance of new interfaces on satisfactory performance. The fact that BST cannot now handle orders for AT&T Digital Link subsequent partial migrations electronically using EDI 7 indicates that its commitment to provide such electronic ordering has been missed and that BellSouth does not take our contract seriously.

The handling of subsequent partial migrations for large business customers has been under discussion between our two companies since 1996. In all other RBOCs, the LOCBAN field for this type of order uses the AT&T main telephone number, not the RBOC's. BST stands alone in being unable to take an AT&T assigned main telephone number in this field or any BST telephone number at a line level and use it to find their account records. I would note that by forcing AT&T, and presumably all other competing local exchange carriers, to tie all orders for their services to BST BTNs provides BellSouth with a convenient way to view all of the competitive offerings being used by its customers. Ready access to such information provides BST with an unfair and insurmountable advantage over competitors. This is troubling to us. Nevertheless, we have been accommodating BST's inability thus far by agreeing to populate the LOCBAN field with the BST main account, and then using a work around in EDI 6 that caused these orders to fall out of BST's electronic process for manual handling by BST. Now, instead of moving forward and fixing this work around in EDI 7 as had been agreed at the end of EDI 6 negotiations, BST is moving backward and insisting that AT&T must either change its systems or use a completely manual process for transmitting the subsequent orders that follow a partial migration.

June 22, 1998

In an April 27, 1998, meeting, BST led us to believe that an additional field, EATN, would be implemented by the end of June that would allow subsequent partial migrations to be handled electronically. After repeated attempts by AT&T to confirm this, BST informed us that they would implement the new field in June only for manual, not electronic orders. Electronic orders with these fields would not be accepted until first quarter 1999. BST's unclear statements on availability followed by its arbitrary decision to delay the electronic capability seem calculated to delay AT&T's market entry for AT&T Digital Link by pulling an essential ordering capability at the latest possible moment.

To maintain the status quo until BST could modify its systems to accept electronic subsequent migration orders, AT&T suggested several ways to get these orders to drop out of flow through in an EDI 7 environment. BST has refused to entertain these alternatives and appears anxious to move backwards on this issue. While your letter expresses a willingness to pursue alternatives, you've already turned down the suggestions we've made to date. We expect live customer orders requiring subsequent partial migrations to arrive imminently. Lack of this capability hinders our market entry by subjecting our large business customers to a slower, more error-prone, manual process. This is not parity treatment to that which BST itself enjoys. Your suggestion that AT&T could pay BST \$100K per month to keep EDI 6 up lacks any cost basis and appears calculated to discourage an otherwise viable option. Furthermore, Section 8 of Attachment 15 clearly contemplates that all changes to interfaces should not affect production capability and that both parties agree that the new interface is mutually agreeable. Needless to say, that is not the case.

BellSouth's behavior leaves us no choice but to cut over to BellSouth's dictated implementation of EDI 7 and to send subsequent partial migration orders manually. This is unsatisfactory to AT&T but we have no choice if we are to proceed with market entry. I request that BellSouth fulfill its obligation to work cooperatively with AT&T to make this new interface mutually agreeable as the contracts contemplate. (I might add that if AT&T is the only user of EDI 6 and EDI 7 as your letter states, I can't understand why it is such a problem to work this out.) There are two things we need from BellSouth immediately if we are to do this. The absence of either of these two things would be a clear sign that BellSouth is not serious in proposing that subsequent migration orders be handled manually. Due to the urgency of our market entry plans these have already been communicated to the account team through phone calls from Pam Nelson and Ray Crafton and calls that you and I have had.

a. First, we need a document from you describing where to place the AT&T account information on a manual subsequent migration order. This is the information that used to be placed in the remarks field on an EDI 6 order. To ensure clarity, we ask that you include with the documentation a copy of the form and an example of the form filled out in its entirety. We need this information immediately to keep our entry plans on track. I understand that on June 18th, we received this. We are in the process of working with your team to confirm our understanding of those procedures.

b. Second, we need your commitment that these manual orders will be handled according to the DMOQs in interconnection agreement Attachment 12 (1 hour rejects, 24 hour FOCs, etc.) It is our understanding that, although BST does not believe that it must provide completions on manual orders, BST would agree to provide a paper list on a daily basis of orders completed with a time stamp. Such handling is consistent with the provisions of Attachment 4 which require BST to provide completion notices using the same interface that

Mr. W. Scott Schaefer

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June 22, 1998

AT&T uses to submit its order (Section 3.5). To make this list useful, we need your commitment to include the working telephone numbers on the list along with the version number.

I anxiously await your response on whether BST will commit to adherence to the DMOQ for these manual orders and whether BST will cooperate in reaching a mutually satisfactory fix to the problem of subsequent partial migrations in the context of EDI 7 implementation.

Sincerely,



Philip H. Osman  
Vice President  
Consumer Local Services  
AT&T

cc: M. Augier  
R. Crafton

# **ATTACHMENT 24**

## Subsequent Migration Order To an Existing Account: ORDER Remarks Workaround

1. Assume the First Migration Order Migrated one line and established a new account for number 2000.

AT&T  
CUSTOMER ACCOUNT

1. Account  
Number = 2000

2. Additional  
number, 3000.

Based on EDI 6  
Implementation  
Action items AT&T  
implemented two  
fields internally:

LECBTN = 2000

Old-LECBTN = 1000

2..MIGRATION ORDER TO ADD  
ADDITIONAL NUMBER ,3000,  
TO EXISTNG ACCOUNT, 2000,  
FROM ACCOUNT 1000 .

One MIGRATION ORDER

LOCBAN =  
FROM ACCOUNT

1000

Number moving:

3000

Remarks = TO ACCOUNT

2000

BELLSOUTH  
FROM ACCOUNT

BellSouth Account  
Number = 1000  
Tele. Number s:  
2000, 3000, 4000

TO ACCOUNT

1. New Migrated Account  
Number = 2000  
2. Additional number,  
3000

Workaround requires use of  
ORDER REMARKS to  
communicate the TO  
ACCOUNT

## TWO ORDER OPTION :

1. Assume the First Migration Order Migrated one line and established a new account for number 2000.

### AT&T CUSTOMER ACCOUNT

1. Account Number = 2000
FIRST ORDER ADDS 3000
SECOND ORDER ADDS 3000 AGAIN

2..MIGRATION ORDER TO ADD  
ADDITIONAL NUMBER ,3000,  
TO EXISTNG ACCOUNT, 2000,  
FROM ACCOUNT 1000 .

First Order: Migration  
LOCBAN = 1000  
ADD TN = 3000  
MAIN LIST = 3000

*related to*

Second Order: CHANGE  
LOCBAN = 2000  
ADD TN = 3000  
MAINLIST = 2000

This two order option falls out at  
BellSouth for manual processing

### BELLSOUTH FROM ACCOUNT

BellSouth Account  
Number = 1000  
Tele. Number s:  
2000, 3000, 4000

1.

TO ACCOUNT

New Migrated Account  
Number = 2000

2.

TEMP ACCOUNT

ACCOUNT NUMBER =  
MAIN LIST = 3000

TO ACCOUNT after ORDER 2

ACCOUNT NUMBER  
= 2000  
Additional TN = 3000  
MAIN LIST = 2000

# ATTACHMENT 25





BellSouth Interconnection Services 770 492-7590  
Suite 200 Fax 770 492-0937  
1960 West Exchange Place Internet  
Ducker, Georgia 30084 Jan.Burris1@bridge.bellsouth.com

Jan M. Burris  
Sales Assistant Vice President  
AT&T Regional Account Team

June 15, 1998

Pam Nelson  
AT&T  
Promenade I, FLOC 12W54  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Dear Pam,

This is a follow-up to the recent discussions concerning subsequent partial migrations within TCIF Issue 7. As you are aware, this issue has been addressed a number of times over the past few months and we keep ending up with the same solutions. AT&T may choose to either submit the subsequent partial migration orders manually, or submit two related electronic orders utilizing the RPON field. At AT&T's request BellSouth revisited these issues again over the past couple of weeks and again we have arrived with this same set of solutions.

Our understanding is that the EATN field will enable the functionality that AT&T is requesting. As stated previously, that field should be available in TCIF Issue 8. If AT&T would like to pursue any other electronic solutions to this issue, I encourage you to utilize the established change control process.

Finally, as you know, TCIF Issue 8 is scheduled to be brought down tomorrow night June 16, 1998 at midnight. An offer has been extended to AT&T to keep Issue 8 up and operational if AT&T is willing to pay the associated expense. I understand that AT&T has verbally rejected that offer. If you reconsider your position, I will need to know in writing by noon on June 16, 1998 so that we can work through the agreements necessary to keep the platform operational.

I look forward to your response.

Sincerely,

cc: Ray Crafton  
Quinton Sanders  
Stephen Travers  
Debra Stockton

# **ATTACHMENT 26**



BellSouth Telecommunications, Inc.  
Suite 4011  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30376

404 827-7020  
Fax 404 827-2311

W. Scott Schaefer  
President - Interconnection Services

June 15, 1998

Mr. Phillip H. Osman  
Vice President Consumer Services Division  
AT&T  
Room 5162D1  
295 N. Maple Avenue  
Basking Ridge, NJ 07920

Dear Phil:

It was good talking with you Wednesday. I'm hopeful that we can establish a business relationship that will allow us to pursue mutually beneficial opportunities. In that regard, I asked my people to prepare the attached in response to your questions during our call. Hopefully, this information will help clarify the Subsequent Partial Migration Issue.

Our respective organizations have discussed this since February of this year. While our alternatives are limited, we are willing to pursue any additional ideas you might have. If you are interested in keeping EDI-6 functional, we must know by noon on June 16, 1998. Please contact Quinton Sanders at 770-492-7560 if you wish to pursue this option.

I look forward to seeing you in July.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Scott Schaefer".

cc: Quinton Sanders  
Joe Baker  
Jan Burries

Attachment

## Background

July 97	EDI Issue 7 standards published with target date of January 98 for introduction/production.
September 97	AT&T / BST preliminary discussions concerning EDI-7 capabilities.
October 97	AT&T request that EDI-7 implementation date be moved from January 98 to March 16, 1998...BST agreed to delay implementation.
October 30 & 31, 97	EDI-7 requirements were published and presented to all CLECs on these dates.
November, December, January, 97/98	Numerous meetings/discussions held with AT&T to resolve questions regarding EDI-7 implementation.
December, January, February, 97/98	At AT&T's request a separate BST team worked on Directory Listing issues outside EDI-7 implementation.
December, January, February, 97/98	BST worked special request issues for AT&T concerning AT&T Digital Link® (ADL) introduction, e.g., Directory Listings, RIPH, etc.
February 26, 98	End to End testing for EDI-7 (including ADL) began with a target date for production of March 16, 1998.
March 98	BST implemented EDI-7 on March 16, 1998 which included electronic reject capability.
March 98-Present	After numerous requests (by AT&T) to extend the End to End test process, AT&T was still in ETET mode June 12, 1998.
June 98	BST is being asked to keep EDI-6 running because AT&T's systems cannot send related orders that are required for Subsequent Partial Migration type orders.

## Other Pertinent Information

- Subsequent Partial Migration orders were processed through EDI-6 manually, i.e., a "Remarks" entry flagged the system to drop out these orders for manual handling since EDI-6 would not process comments in the "Remarks" section.
- The enhancement in EDI-7 allows entries in the "Remarks" section to be read mechanically; allowing orders to flow through rather than being rejected.
- AT&T's request for Subsequent Partial Migration type orders required specific fields that are not yet approved by the OBF Standards Forum. This is planned for EDI Issue 8. If standards are published as expected in August 98, this capability will be available in February 1999 (as outlined in our Interconnection Agreement).

- AT&T is the only user of EDI-6 and EDI-7.
- In order to maintain consistency with national standards and due to the volume of EDI-7 activity (plus other AT&T special requests, e.g., Directory Listing Enhancements) we are unable to include this EDI-8 capability.
- EDI-7, including the additional Directory Listing enhancements, was designed to facilitate order flow through thereby eliminating manual work in the LCSC. This will improve process time and provide for the capability of electronic rejects, all of which would drive better customer service and allow for improved performance results.
- BST has recommended to AT&T that they incorporate the related order capability into their current systems. This will not only resolve the Subsequent Partial Migration issue in the Issue 7 release, but will be essential to support AT&T's entry into the complex business market.

#### Alternatives To Address This Issue

Information previously provided to all CLECs concerning how to handle these types of orders included two alternatives:

- Process single orders manually.
- Process 2 related electronic orders.

Note: AT&T is unwilling to process orders manually and as previously mentioned does not have the ability to generate related electronic orders.

#### AT&T's Request

- Continue leaving EDI-6 in place including the manual work around process.

Note: BST is willing to do this "at cost" if AT&T will agree to pay monthly for this service.

- Allow AT&T to generate an electronic order in EDI-7 and have BST make the order fall out for manual handling.

Note: The alternative not only defeats the purpose of EDI-7, it has the potential to significantly extend the processing time if large volumes of orders are released by AT&T. In this event, service levels may become unacceptable. BST does not consider this to be a viable alternative since the appropriate fields to resolve this problem is already a planned function of EDI-8.

## Conclusion

After exploring alternatives again the week of June 8, the only options BST can offer are:

- AT&T can build the related order capability into their system.
- BST can leave EDI-6 up until AT&T's related order capability becomes available (for a monthly fee).
- BST will process AT&T's single orders manually.

# **ATTACHMENT 27**

## Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1471
Date Submitted	04/21/97
Date Accepted	04/25/97 at OBF #58
Initial Closure	08/15/97 at OBF #59
Final Closure	11/07/97 at OBF #60
Issue Category	Resolved

Part A, Page 1

Issue Title: Add TOS at the line level

Issue Statement: In order to be able to order a mixture of order level and line level services per account there is a need to add TOS at the line level.

Impact of Other Issues or Procedures:

Desired Results: Establish TOS at the line level for the INP, Loop, Loop with INP, Port, and Resale forms.

Committee Assignment: O&P Committee

Associated Committee: TOR, EDI

Issue Champion: Thomas Smith

Company: AT&T

Address: 131 Morristown Road  
Room A1449  
Basking Ridge, NJ

Telephone: 908-953-4423

Resolution: Added new field, LTOS, to Resale and Port Forms and updated the Usage Note of TOS on the LSR.



## Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1471
Date Submitted	04/21/97
Date Accepted	04/25/97 at OBF #58
Initial Closure	08/15/97 at OBF #59
Final Closure	11/07/97 at OBF #60
Issue Category	Resolved

Part B, Page 1  
(Committee Use Only)

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Issue Title: Add TOS at the line level

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### Status History:

04/25/97 (OBF#58)

Mr. Tom Smith, AT&T, the issue champion, introduced the issue. He explained the need to add TOS at the line level in order to be able to order a mixture of order level and line level services per account. After brief discussion, consensus was reached. There were no objections.

Assigned 1471/O&P, Associates TOR, EDI

OBF#59 - 08/15/97

Mr. Tom Smith, AT&T, reviewed the Issue. He displayed the new LTOS Field which is proposed for the Resale and Port Forms at the line level. Ms. Joan Perry, SNET, stated that the 2<sup>nd</sup> (product) character of the existing TOS Field becomes ambiguous (at the account level) if it is a multi-line account, thus it was agreed that a new field at the line level was necessary.

Mr. Dean Jauchius, Bellcore, suggested placing the 1<sup>st</sup> (type) character of TOS/LTOS at the account level and the 2<sup>nd</sup>, 3<sup>rd</sup> (class) and 4<sup>th</sup> (characterization) characters at the line level. The Committee agreed that this was not the direction to take.

Verbiage on the LTOS Field was edited. Mr. Smith added an edited version of the LNA field.

It was agreed that the TOS field on the LSR needed updating to reflect the other changes.

Ms. Cassandra Daniels stated that BellSouth cannot support LTOS at the line level, thus it was agreed to make the LTOS field optional.

Mr. Smith added the Resolution, "Added new field, LTOS, to the Resale and Port Forms and updated the usage note for the TOS field on the LSR."

Following the discussion, the Issue was moved to Initial Closure Status. There were no objections.

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## Ordering and Billing Forum Issue Identification Form

OBF Issue Number	1471
Date Submitted	04/21/97
Date Accepted	04/25/97 at OBF #58
Initial Closure	08/15/97 at OBF #59
Final Closure	11/07/97 at OBF #60
Issue Category	Resolved

Part B, Page 2  
(Committee Use Only)

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Issue Title: Add TOS at the line level

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OBF#60 - 11/07/97

Mr. Tom Smith, O&P Co-Leader, AT&T, reviewed the Resolution.

**Following the discussion, the Issue was moved to Final Closure Status. There were no objections.**

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# **ATTACHMENT 28**



Denise C. Berger  
Local Services Organization

Room 12251  
1200 Peachtree Street N.E.  
Atlanta, Georgia 30309  
404-810-8644  
FAX 404-810-8477  
EMAIL [deberger@att.com](mailto:deberger@att.com)

June 19, 1998

Jan Burriss  
BellSouth Telecommunications, Inc.  
1960 West Exchange Place  
Suite 200  
Tucker, Georgia 30084

RE: Manual Orders for ADL Partial Migrations

Dear Jan:

The purpose of this letter is to make certain that AT&T and BellSouth have a common understanding around placing a manual order for partial migrations in the AT&T Digital Link (ADL) environment.

We have used the instructions and sample order sent to us on June 18. Please have the appropriate persons on the BellSouth Account Team review this manual order for accuracy and the correct application of the instructions. We are interested in understanding any and all omissions and/or mistakes that exist.

I will expect your response by noon on Monday, June 22. It is imperative that we place these manual orders on Monday, June 22.

Sincerely,

A handwritten signature in cursive script, appearing to read "Denise", enclosed within a circular ink stroke.

Attachment

cc: Pam Nelson

# Local Service Request

v2 (4-87)

Administrative Section		1. CCNA A T X	2. PON A 9 8 0 6 T U C K G A 0 0 0 0 1	3. VER	4. LSR NO
		6. ATN 4 0 7 - 8 5 8 - 8 0 0 0	7. SC L C S C	8. PG 0 1	9. D/T SENT 0 7 0 6 - 2 2 - 1 9 9 8 - 1 2 0 0 P M
11. APPTIME 2 6 - 7 9 9 8		12. DDDO	13. APPTIME	14. DFDT 1 2 0 0 P M	15. PROJECT
17. REQTYP C B	18. ACT Y	19. SUP	20. EXP Y	21. AFO	22. RTR 7 4 2 1
23. CC	24. AENG	25. ALBR	26. SCA	27. AGAUTH Y	28. DATED
29. AUTHNM	31. AI	32. APOT	33. LST	34. LSO	35. TOS 1 A
36. SPEC	37. NC	39. CHANNEL	40. SEC NCI	41. RPON	42. RORD
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50. BI1	51. BAN1 9 0 4 Q 9 0 9 0 9 1 0 9 1	52. BI2	53. BAN2	54. ACNA	55. EBD
56. NM	57. SBILLNM	58. TE L	59. EBP	60. EET	61. FLOOR
62. ROOM	63. CITY	64. STATE	65. CODE	66. BILLCON	67. TEL NO
68. VTA	69. CT	70. TEL NO 8 0 0 - 2 3 4 - 2 6 7 2 -	71. EMAIL	72. FAX NO 9 1 6 - 4 3 1 - 0 6 0 8	73. STREET
74. DR	75. ROOM/MAIL STOP	76. CITY	77. STATE C A	78. ZIP CODE 9 5 8 3 4	79. CON
80. TEL NO	81. PAGER	82. IMPCON	83. TEL NO	84. PAGER	85. CON
86. DRC	87. TEL NO	88. FAX NO	89. EMAIL	90. STREET	91. DR
92. ROOM/MAIL STOP	93. CITY	94. STATE	95. ZIP CODE	96. marks	

# End User Information

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v2(4-97)

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## Price Details

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01		<input checked="" type="checkbox"/>					
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v2(4-97)

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23. TC OPT [ ]	24. TC TO [ ]	25. TC PER [ ]	26. TC TO [ ]	27. TC PER [ ]

Remarks PORTING 20 NUMBERS



# Number Portability

v2(4-97)

Administrative	1.PON	2.VER	3.AN	4.ATN	5.NPQTY	6.PG	OF
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ECCKT				
PORTED#	14.TNP	15.CFTN	16.npt 17.RTI	18.NPTG
1 7	2 5 1 - 2 9 5 9		C 0 0 0 5 1 5	
BA	20.BLOCK	21.FPI	22.LPIC	23.TC OPT 24.TC TO
				25.TC PER

NUM	8.CKR	9.LNA	10.LRN	11.TDT
1 1		V		
ECCKT				
PORTED#	14.TNP	15.CFTN	16.npt 17.RTI	18.NPTG
1 7	2 5 1 - 2 9 6 0		C 0 0 0 5 1 5	
BA	20.BLOCK	21.FPI	22.LPIC	23.TC OPT 24.TC TO
				25.TC PER

NUM	8.CKR	9.LNA	10.LRN	11.TDT
1 2		V		
ECCKT				
PORTED#	14.TNP	15.CFTN	16.npt 17.RTI	18.NPTG
1 7	2 5 1 - 2 9 6 1		C 0 0 0 5 1 5	
BA	20.BLOCK	21.FPI	22.LPIC	23.TC OPT 24.TC TO
				25.TC PER

rks |P|O|R|T|I|N|G| |2|0| |N|U|M|B|E|R|S|